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October 27, 2010

Arizona Corporation Commission

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Chairperson Mayes and Members  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, Arizona 85007

OCT 28 2010

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AZ CORP COMMISSION  
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**RE: Docket Number RG-00000B-09-0428 Gas Energy Efficiency and the Gas Utility Energy Efficiency Standards**

Dear Chairperson Mayes and Members of the Arizona Corporation Commission:

On behalf of the undersigned organizations, we want to express our support and appreciation for the Arizona Corporation Commission's significant commitment to increasing energy efficiency and promoting clean renewable energy, both of which will help Arizona reduce its emissions of air pollutants and greenhouse gas emissions, plus benefit consumers by saving energy and energy dollars. Many of our members have natural gas service that is affected by this rule to establish an energy efficiency standard for gas and will see the economic benefits. All of us, as Arizonans, will realize the environmental and societal benefits.

A standard to achieve 6 percent energy savings by 2020 is a reasonable standard for Arizona. Increasing energy efficiency as proposed in this Gas Energy Efficiency Rule will provide several benefits to gas utility ratepayers, including both residential and business customers. The benefits are cost effective – Arizonans will benefit from lower gas bills with a reasonable investment.

The environmental benefits from the rule include cleaner air as a result of reductions in oxides of nitrogen and in reducing greenhouse gas emissions, including carbon dioxide and methane. Methane is emitted when natural gas does not burn completely and methane is a powerful greenhouse gas.

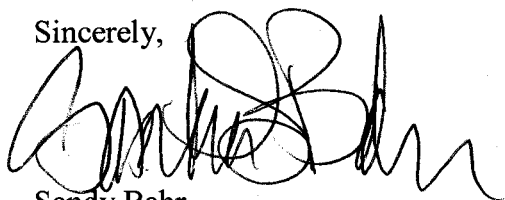
Another important benefit of investing in energy efficiency measures is it helps to create jobs, something critical at a time when unemployment is high and the economy continues to lag.

We support the provision to give the utility credit for energy savings regarding building codes, but to only count the energy savings resulting from energy efficiency building codes and appliance standards, **if** the utility demonstrates and documents its efforts to support the adoption and implementation of those energy efficiency building codes and appliance standards. If the building code and appliance standards are improved without the support the affected utility, that utility should not be able to count this toward its energy savings.

We also agree that provision for three-quarters of the energy savings coming from the energy efficiency programs apply to **every** year set forth in the Gas Energy Efficiency Standard, and not just to 2020.

Thank you for considering our comments and again for your support of increasing energy efficiency in throughout Arizona.

Sincerely,



Sandy Bahr  
Sierra Club – Grand Canyon Chapter

Al Sterman  
Democratic Processes Center

Doug Bland  
Arizona Interfaith Power and Light

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Gem Marketing Pearls, Inc.

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